

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	CASE NO. 24 CR 00176
	)	
PLAINTIFF	)	JUDGE PAMELA BARKER
	)	
v.	)	
	)	
GEORGE BAYNES	)	<b><u>MOTION TO APPROVE/</u></b>
	)	<b><u>APPOINT INVESTIGATOR</u></b>
DEFENDANT	)	

Defendant George Baynes now requests that the court approve the appointment of a private defense investigator at the governments cost. As the court is aware, Defendant Baynes is indigent and has been assigned appointed legal counsel. Due to the nature and volume of discovery in this case, undersigned counsel needs the assistance of an investigator. Further, Defendant Baynes can not read, and therefore extra time has to be spent converting documents to audio files and then reviewed with Defendant. This, also, requires substantial assistance. Investigator Christopher Giannini of International Investigations is available and willing to undertake this assignment. Mr. Giannini is a retired police officer with decades of experience as a private investigator in criminal cases in both state and federal court.

For the foregoing reasons, Defendant requests that Mr. Giannini and his firm International Investigations be assigned as his investigator in this matter.

Respectfully submitted,

/s/ Michael P. Maloney

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**CERTIFICATE OF SERVICE**

A copy of the foregoing Motion was served this 1<sup>st</sup> day of July, 2025 to the United States Attorney, through the court's electronic filing system.

*/s/ Michael P. Maloney*

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Michael P. Maloney (0038661)  
Attorney for Defendant